

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SKYHOOK WIRELESS, INC.,  
  
Plaintiff and  
Counterclaim-Defendant,

v.

GOOGLE INC.,  
  
Defendant and  
Counterclaimant.

Case No. 1:10-cv-11571-RWZ

**DECLARATION OF SAMUEL K. LU IN  
SUPPORT OF SKYHOOK WIRELESS,  
INC.'S OPPOSITION TO GOOGLE  
INC.'S MOTION FOR SUMMARY  
JUDGMENT OF INDEFINITENESS AND  
SKYHOOK WIRELESS, INC.'S REPLY  
CLAIM CONSTRUCTION BRIEF**

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I, Samuel K. Lu, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP ("Irell & Manella"), counsel to plaintiff Skyhook Wireless, Inc. ("Skyhook"). I am a member in good standing of the State Bar of California, and have been admitted to the Bar of this Court for the purpose of this litigation. I submit this declaration in connection with Skyhook's opposition to Google Inc.'s motion for summary judgment and Skyhook's reply claim construction brief. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could testify to its contents.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the transcript of the deposition of Anthony S. Acampora, Ph.D., which was held on September 22, 2011.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from Anthony S. Acampora, *An Introduction to Broadband Networks* (1994).

4. Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No. 4,425,639.

5. Attached hereto as Exhibit D is a true and correct copy of U.S. Patent Application No. 20080039130.

6. Attached hereto as Exhibit E is a true and correct copy of U.S. Patent No. 7,869,667 B1.

7. Attached hereto as Exhibit F is a true and correct copy of U.S. Patent No. 7,627,548.

8. Attached hereto as Exhibit G is a true and correct copy of U.S. Patent No. 7,751,592.

9. Attached hereto as Exhibit H is a true and correct copy of Skyhook's Opening Claim Construction Brief, Dkt. #49.

10. Attached hereto as Exhibit I is a true and correct copy of Exhibit 1 to the deposition of Anthony S. Acampora, Ph.D., which was held on September 22, 2011.

11. Attached hereto as Exhibit J is a true and correct copy of excerpts from *The American Heritage College Dictionary* (3rd ed. 1997) produced by Skyhook in this litigation, bates marked SKYFED013732–33, and SKYFED013736.

12. Attached hereto as Exhibit K is a true and correct copy of excerpts from *Wiley Electrical and Electronics Engineering Dictionary* (2004) produced by Skyhook in this litigation, bates marked SKYFED013811–12, and SKYFED013814.

13. Attached hereto as Exhibit L is a true and correct copy of excerpts from *McGraw-Hill Dictionary of Scientific and Technical Terms* (4th ed. 1989) produced by Skyhook in this litigation, bates marked SKYFED013711–12, and SKYFED013714.

14. Attached hereto as Exhibit M is a true and correct copy of excerpts from *Merriam-Webster's Collegiate Dictionary* (10th ed. 2001) produced by Skyhook in this litigation, bates marked SKYFED013717–18, and SKYFED013723.

Executed on September 28, 2011, in Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Samuel K. Lu

Samuel K. Lu

**Certificate of Service**

I, Samuel K. Lu, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 28, 2011.

*/s/ Samuel K. Lu*

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Samuel K. Lu